

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**UNITED STATES OF AMERICA,**

Case No. 2:14-cv-01372-JAD-PAL

**Plaintiff,**

V.

6 PAT CLARK, JR., individually, as Executor of the  
7 Estate of Bernice Clark, as Trustee of the Pat Clark,  
8 Jr. Separate Property Trust, as Trustee of the Pat Clark  
9 Voting Stock Trust, as Trustee of the Pat Clark  
GST Trust, as Trustee of the Pat Clark Issue Trust, as  
Trustee of the Bernice Clark Retained Annuity Trust  
#2, and as Trustee of the Bernice Clark 2000  
Retained Annuity Trust; BARBARA C. KLASSEN,  
individually, as Trustee of the Barbara C. Klassen  
Legacy Trust, and as Trustee of the Clark Ranch  
House Trust; JOANN CALLAHAN a/k/a JOANN P.  
CLARK, individually, as Trustee of the Joann Clark  
Legacy Trust, and as Trustee of the Clark Ranch  
House Trust; MARY LOUISE HOUSTON,  
individually, as Trustee of the Saucer 5 Legacy Trust,  
and as Trustee of the Clark Ranch House Trust;  
ALAN GREEN, as Trustee of the Houston  
Irrevocable Trust; KIMBERLY WASSERBURGER  
KOUBA; C.R. CLARK; RORY CLARK; and  
DANIEL T. CALLAHAN.

#### Defendants.

AND ALL RELATED CLAIMS.

## **STIPULATION EXTENDING THE CASE DEADLINES**

Pursuant to Local Rule 6-1, and the Federal Rules of Civil Procedure, the Parties hereby acknowledge their stipulation and agreement to extend the following deadlines:

1. As set forth in the Scheduling Order (Doc. 28) entered by the Court the following deadlines are currently in effect:

Discovery Cut-Off Date: June 5, 2015

## Rebuttal Expert Disclosures: May 6, 2015

## Dispositive Motions: July 6, 2015

Pretrial Order: August 5, 2015 (In the event dispositive motions are filed the date for filing the joint pretrial order shall be suspended until thirty (30) days after decision of the dispositive motion or further order of the court.)

2. The parties have been actively engaging in discovery in this matter. The parties have exchanged initial disclosures pursuant to Fed.R.Civ.P. 26-1, served interrogatories and requests for production of documents and designated expert witnesses.

3. The Parties collectively desire to extend the current deadlines set forth above by approximately 100 days , so that the parties can engage in settlement negotiations and if necessary a court imposed settlement conference before incurring any additional litigation costs. Specifically, the parties hereby respectfully request that the Court amend the Scheduling Order as follows:

4. Discovery Cut-Off Date: September 15, 2015

## 5. Rebuttal Expert Disclosures: June 8, 2016

## 6. Dispositive Motions: October 15, 2015

7. Pretrial Order: November 16, 2015 (In the event dispositive  
as are filed, the date for filing the proposed joint pre-trial order shall be suspended until  
(30) days after decision of the dispositive motion or further order of the court.)

8. The Parties state that this stipulation is made in good faith and not for purposes of delay.

RESPECTFULLY SUBMITTED this 1<sup>st</sup> day of May, 2015.

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8       Klassen Legacy Trust, and as Trustee of the  
9       Clark Ranch House Trust, Joann Callahan  
10      a/k/a Joann P. Clark, individually, as  
11      Trustee of the Joann Clark Legacy Trust, and  
12      as Trustee of the Clark Ranch House Trust,  
13      Kimberly Wasserburger Kouba, C.R. Clark,  
14      Rory Clark, and Daniel T. Callahan*

-and-

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4       Trust, as Trustee of the Pat Clark GST Trust,  
5       as Trustee of the Pat Clark Issue Trust, as  
6       Trustee of the Bernice Clark Retained Annuity  
7       Trust #2, and as Trustee of the Bernice Clark  
8       2000 Retained Annuity Trust*

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23      District of Nevada

24      *Attorneys for the United States of America*

25      **IT IS SO ORDERED:**

26        
27      U.S. DISTRICT/MAGISTRATE JUDGE

28      DATED: May 12, 2015